IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

PRODUCTS LIABILITY LITIGATION) Master Docket No.:) 2:18-mn-2873-RMG
CITY OF CAMDEN, et al., Plaintiffs,) Civil Action No.: 2:23-cv-03147-RMG)
-VS-)
3M Company,)
Defendant.)))

JOINT MOTION TO RECONSIDER AND AMEND PRELIMINARY APPROVAL ORDER

Proposed Class Counsel, along with 3M Company (the "Settling Defendant," and with Proposed Class Counsel, the "Parties"), move to reconsider and amend the Order Granting Preliminary Approval, entered by the Court on August 29, 2023 (ECF No. 3626). The grounds for this motion are as follows:

1. On August 29, 2023, the Court issued a Preliminary Approval Order for Settlement Between Public Water Systems and 3M Company (the "3M Order") (ECF No. 3626). Article VIII of the 3M Order includes a Stay and Injunction, which provides that "after the Final Fairness Hearing, the stay and injunction shall not apply to any Person who has filed (and not withdrawn) a timely and valid Request for Exclusion and that the stay and injunction shall not apply to litigation brought by a State or the federal government."

2. Because the Stay Order and Injunction prohibits the filing of new cases on the terms set forth therein, the Parties request a modification providing that any statutes of limitations or repose for any Claims that a Releasing Person is enjoined from filing by Section VIII of the Order Granting Preliminary Approval shall be tolled during the pendency of such Stay Order and Injunction.

3. Attached hereto is a redline showing the proposed amendments to Section VIII of the Order Granting Preliminary Approval as set forth above. Proposed Class Counsel and the Settling Defendant respectfully request that the Court enter an amendment to the Order Granting Preliminary Approval incorporating the changes in the attached redline.

Dated: September 18, 2023

Respectfully submitted,

/s/ Michael A. London

Michael A. London
Douglas and London PC
59 Maiden Lane, 6th Floor
New York, NY 10038
212-566-7500
212-566-7501 (fax)
mlondon@douglasandlondon.com

/s/ Paul J. Napoli

Paul J. Napoli Napoli Shkolnik 1302 Avenida Ponce de León San Juan, Puerto Rico 00907

Tel: (833) 271-4502 Fax: (646) 843-7603 pnapoli@nsprlaw.com

/s/ Scott Summy

Scott Summy
Baron & Budd, P.C.
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219

214-521-3605 ssummy@baronbudd.com

/s/ Elizabeth A. Fegan

Elizabeth A. Fegan Fegan Scott LLC 150 S. Wacker Drive, 24h Floor Chicago, IL 60606 312-741-1019 beth@feganscott.com

/s/ Joseph F. Rice

Joseph F. Rice Motley Rice 28 Bridgeside Blvd. Mount Pleasant, SC 29464 jrice@motleyrice.com

Class Counsel

/s/ Richard F. Bulger

Richard F. Bulger
Daniel L. Ring
Michael A. Olsen
MAYER BROWN LLP
71 South Wacker Drive
Chicago, IL 60606
rbulger@mayerbrown.com
dring@mayerbrown.com
molsen@mayerbrown.com

Brian Duffy Duffy & Young 96 Broad Street Charleston, SC 29401 bduffy@duffyandyoung.com

Counsel for 3M Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 18th day of September, 2023 and was thus served electronically upon counsel of record.

/s/ Michael A. London

Michael A. London Douglas and London PC 59 Maiden Lane, 6th Floor New York, NY 10038 212-566-7500 212-566-7501 (fax) mlondon@douglasandlondon.com